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Attorneys for Defendant  
**PLATINUM HOTEL & SPA AND WILLIAM SIMPSON**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

## THEODORE HOOKS,

**Plaintiff,**

VS.

PLATINUM HOTEL & SPA, WILLIAM SIMPSON, and ROY FOSTER, a guest of the hotel.

Defendant.

Case No. 2:10-CV-01151-KJD-RJJ

WILLIAM SIMPSON'S MOTION TO  
EXTEND TIME TO FILE RESPONSE TO  
COMPLAINT

**(First Request)**

COMES NOW Defendant William Simpson by and through counsel, and hereby respectfully requests an extension of time to file his responsive pleading in the above-entitled action, up to and including February 23, 2011.<sup>1</sup>

This is the first extension of time requested by Simpson in connection with this matter. Mr. Simpson requests this brief extension, not for purposes of delay. Rather, for the same reasons set forth further in the Declaration of Peter D. Navarro, attached as Exhibit A to Platinum Hotel & Spa's Motion to Extend Time to File Response to Complaint [Dkt. No. 13]. Mr. Simpson only recently retained counsel who need additional time to investigate Plaintiff's allegations and prepare a full and

<sup>1</sup> Mr. Simpson requests the same extension to respond as was granted Defendant, Platinum Hotel & Spa through this Court's Order dated February 8, 2011 [Dkt. No. 14]. It was counsel's original intent to request an extension for both Mr. Simpson and the Platinum Hotel, however, Mr. Simpson's name was inadvertently omitted from the prior motion [Dkt. No. 13].

1 complete response to Plaintiff's Complaint. In addition, Mr. Simpson counsel has been unable to  
2 contact Plaintiff in order to obtain Plaintiff's position on the filing of this motion as the telephone  
3 number provided with Plaintiff's Complaint appears to be out of service and unable to receive voice  
4 mail.

5 Mr. Simpson further submits that the extension sought will not interfere with this Court's  
6 schedule as specific dates for this case have not yet been set by the Court.

7 Dated: February 9, 2011  
8

9 Respectfully submitted,



10  
11 WENDY MEDURA KRINCEK, ESQ.  
12 PETER D. NAVARRO, ESQ.  
13 LITTLER MENDELSON

14 Attorneys for Defendant  
15 PLATINUM HOTEL & SPA AND WILLIAM  
16 SIMPSON

17 IT IS SO ORDERED.



18  
19 UNITED STATES MAGISTRATE JUDGE  
20 DATE: MARCH 14, 2011